LAW OFFICES
SMITHWICK & BELENDIUK, P.C.
5028 WISCONSIN AVENUE, N.W.
SUITE 301
WASHINGTON, D.C. 20016
TELEPHONE (202) 363-4050
FACSIMILE (202) 363-4266

GARY S. SMITHWICK
ARTHUR V. BELENDIUK

COUNSEL
MARK B. DENBO

DIRECT DIAL NUMBER: (202) 350-9656
E-MAIL ADDRESS: mdenbo@fccworld.com

February 22, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Villages Communications, Inc.
Application for Direct Measurement of Power
WVLG(AM), Wildwood, Florida (Facility No. 70724)

Dear Ms. Dortch:

Transmitted herewith in triplicate, by the undersigned counsel to Villages Communications, Inc., licensee of the above-referenced station ("Station"), is an application filed on FCC Form 302-AM for direct measurement of power associated with the Station. Because this is an application for direct measurement of power, there is no FCC application processing fee associated with this filing.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

Mark B. Denbo
Counsel to Villages Communications, Inc.

cc: Son Nguyen/FCC (*via e-mail*)

Accepted / Filed

Federal Communications Commission
Washington, D. C. 20554

Approved by OMB
3060-0627
Expires 01/31/98

FOR FCC USE ONLY

FEB 22 2019

Federal Communications Commission
Office of the Secretary

FCC 302-AM
APPLICATION FOR AM BROADCAST STATION LICENSE

(Please read instructions before filling out form.

FOR COMMISSION USE ONLY
FILE NO. BZ-20190222ABY

SECTION I - APPLICANT FEE INFORMATION

1. PAYOR NAME (Last, First, Middle Initial)

Villages Communications, Inc.

MAILING ADDRESS (Line 1) (Maximum 35 characters)
1020 Lake Sumter Landing

MAILING ADDRESS (Line 2) (Maximum 35 characters)

CITY	STATE OR COUNTRY (if foreign address)	ZIP CODE
The Villages	FL	32162

TELEPHONE NUMBER (include area code)	CALL LETTERS	OTHER FCC IDENTIFIER (If applicable)
352-753-1119	WVLG	Facility No. 70724

2. A. Is a fee submitted with this application? ☐ Yes ☑ No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section

☐ Governmental Entity ☐ Noncommercial educational licensee ☑ Other (Please explain): Direct Measurement of Power

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).

(A) FEE TYPE CODE	(B) FEE MULTIPLE	(C) FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY
	0001	$	

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)	FOR FCC USE ONLY
	0001	$	

	TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY
ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.	$	

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT Villages Communications,Inc.		
MAILING ADDRESS 1020 Lake Sumter Landing		
CITY The Villages	STATE FL	ZIP CODE 32162

2. This application is for:

☑ Commercial ☐ Noncommercial

☐ AM Directional ☑ AM Non-Directional

Call letters	Community of License	Construction Permit File No.	Modification of Construction Permit File No(s).	Expiration Date of Last Construction Permit
WVLG	Wildwood, FL	N/A	N/A	N/A

3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620?

☐ Yes ☐ No N/A

If No, explain in an Exhibit.

Exhibit No. N/A

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met?

☐ Yes ☐ No N/A

If No, state exceptions in an Exhibit.

Exhibit No. N/A

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect?

☐ Yes ☐ No N/A

If Yes, explain in an Exhibit.

Exhibit No. N/A

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)?

☐ Yes ☐ No N/A

☑ Does not apply

If No, explain in an Exhibit.

Exhibit No. N/A

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☑ No

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

Exhibit No. N/A

8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

☐ Yes ☑ No

If Yes, provide particulars as an Exhibit.

Exhibit No. N/A

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

☑ Yes ☐ No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name	Signature	
Kelsea Morse Manly	Kelsea M. Manly	
Title	Date	Telephone Number
President	2/22/2019	352-753-1119

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

SECTION III - LICENSE APPLICATION ENGINEERING DATA

Name of Applicant
Villages Communications, Inc.

PURPOSE OF AUTHORIZATION APPLIED FOR: (check one)

☐ Station License ☑ Direct Measurement of Power

1. Facilities authorized in construction permit					
Call Sign	File No. of Construction Permit (if applicable)	Frequency (kHz)	Hours of Operation	Power in kilowatts	
				Night	Day
WVLG		640	Unlimited	0.86	0.93

2. Station location	
State	City or Town
FL	Wildwood

3. Transmitter location			
State	County	City or Town	Street address (or other identification)
FL	Sumter	The Villages	8739 NE 102 Road

4. Main studio location			
State	County	City or Town	Street address (or other identification)
FL	Sumter	The Villages	995 Lakeshore Drive

5. Remote control point location (specify only if authorized directional antenna)			
State	County	City or Town	Street address (or other identification)

6. Has type-approved stereo generating equipment been installed? ☐ Yes ☑ No

7. Does the sampling system meet the requirements of 47 C.F.R. Section 73.68? ☐ Yes ☐ No ☑ Not Applicable

Attach as an Exhibit a detailed description of the sampling system as installed. Exhibit No. N/A

8. Operating constants:	
RF common point or antenna current (in amperes) without modulation for night system 1.85	RF common point or antenna current (in amperes) without modulation for day system 1.92
Measured antenna or common point resistance (in ohms) at operating frequency Night 252 Day 252	Measured antenna or common point reactance (in ohms) at operating frequency Night - j 83 Day - j 83

Antenna indications for directional operation

Towers	Antenna monitor Phase reading(s) in degrees		Antenna monitor sample current ratio(s)		Antenna base currents	
	Night	Day	Night	Day	Night	Day
N/A						
					-	

Manufacturer and type of antenna monitor: N/A

SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lighting)	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
Guyed Uniform Cross Section	91.4	91.4	93.6	Exhibit No. N/A

Excitation ☐ Series ☑ Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	West Longitude
28 ° 54 ' 16 "	81 ° 57 ' 36 "

If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits. Exhibit No. N/A

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system. Exhibit No. N/A

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

No Construction Permit

11. Give reasons for the change in antenna or common point resistance.

Installation of FM and FM Translator Antennas on the Tower

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type)	Signature
Ronald D. Rackley, P.E.	Ronald D Rackley
Address (include ZIP Code)	Date
du Treil, Lundin & Rackley, Inc. 3135 Southgate Circle Sarasota, FL 34239	February 21, 2019
	Telephone No. (Include Area Code) 941-329-6008

☐ Technical Director ☑ Registered Professional Engineer

☐ Chief Operator ☐ Technical Consultant

☐ Other (specify)

APPLICATION FOR
DIRECT MEASUREMENT OF POWER INFORMATION
RADIO STATION WVLG
WILDWOOD, FLORIDA

640 KHZ 0.93 KW - D 0.86 kW - N U

February 21, 2019

APPLICATION FOR LICENSE INFORMATION
RADIO STATION WVLG
WILDWOOD, FLORIDA

640 KHZ 0.93 KW - D 0.86 KW - N U

Executive Summary

Item 1	Direct Measurement of Power
Item 2	RFR Protection
Item 3	Sketch Showing Relative Positions of Tower-Mounted Antennas and Feed Skirt Particulars

Executive Summary - WVLG

This engineering exhibit supports an application for direct measurement of power for radio station WVLG in Wildwood, Florida. WVLG has been operating with indirect measurement of power since construction began to install an FM transmitting antenna for radio station WMYZ, pursuant to construction permit BPED-20180117ACL, and an FM transmitting antenna for translator W274BR, pursuant to construction permit BPFT-20180117ACN, on the WVLG tower.

Information regarding direct measurement of power for the WVLG antenna is included herein. The facility is in compliance with all applicable FCC Rules, as demonstrated by the included data.

Ronald D. Rackley, P.E.
February 21, 2019

Direct Measurement of Power – WVLG

Antenna impedance measurements were made using a Delta Electronics OIB-3 Impedance Bridge at the J-plug adjacent to the output of the matching unit that is located within a weatherproof enclosure at the antenna's skirt wire connection point. This location is where the antenna current is sampled by the meter that is used to determine the antenna input power. A Potomac Instruments SD-31/RX-31 generator/receiver unit was used with the radiofrequency bridge for the measurements.

Prior to its use, the calibration of the bridge was checked with a reference standard resistor and the indicated resistance was found to agree with the standard resistor within less than the rated accuracy of the instrument. The antenna impedance was measured to be 252 - j 83 ohms at the WVLG carrier frequency, 640 kilohertz. For the daytime power of 930 watts, the antenna current is 1.92 amperes. For the nighttime power of 860 watts, the antenna current is 1.85 amperes.

RFR Protection - WVLG

The operation of WVLG, on 640 kHz, along with the FM facilities that have transmitting antennas located on the tower, will not result in the exposure of workers or the general public to levels of radio frequency radiation in excess of the limits specified in 47 CFR 1.1310. A fence is in place around the tower base to prevent exposure above the required maximum combined power density levels for the two frequency intervals outside the fenced-in area. There are no other areas in the vicinity of the tower where the maximum levels are exceeded.

Measurements of RFR exposure levels at the site were made with a Holiday Industries model HI-3002 broadband survey meter. A model STE-02 probe was used for the electric field component and a model LFH-02 probe was used for the magnetic field component of the AM band frequency interval, with WVLG operating at full daytime power. Measurements were made for the FM band frequency interval with a model STE-02 probe for the electric field component and a model CH-02 probe for the magnetic field component, with FM station WMYZ-FM and FM translator W274BR both operating at full power and WVLG off the air. The manufacturer's specified probe factors were applied to the meter readings. Observations were made up to heights above 2.0 meters throughout the area surrounding the tower base fence at distances 20 centimeters or more from nearby conducting objects, following the procedures outlined in the FCC's "OET Bulletin 65, Edition 97-01."

At the WVLG carrier frequency, 640 kHz, the specified maximum electric and magnetic field values are 614 V/m and 1.63 A/m, respectively. These represent the maximum power density for the frequency interval corresponding to squared field values of 377,000 V^2/m^2 and 2.66 A^2/m^2 in free space. The most significant power density contribution measured for the AM band frequency interval was from the electric field component, which was 2,500 V^2/m^2 - or 0.7% of the maximum 377,000 V^2/m^2 value.

At FM frequencies, the specified maximum electric and magnetic field values for exposure of the general population are 27.5 V/m and 0.073 A/m, respectively. These

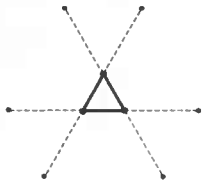
represent the maximum power density for the frequency interval corresponding to squared field values of 756 V^2/m^2 and 0.0053 A^2/m^2 in free space. The maximum power density contribution measured in the FM band frequency interval from the electric field component was 300 V^2/m^2, or 40% of the maximum 756 V^2/m^2 value.

The sum of the fractional contributions of the AM band and FM band frequency intervals relative to their maximum limits is less than 100%. The requirements of the FCC rules, therefore, are met.

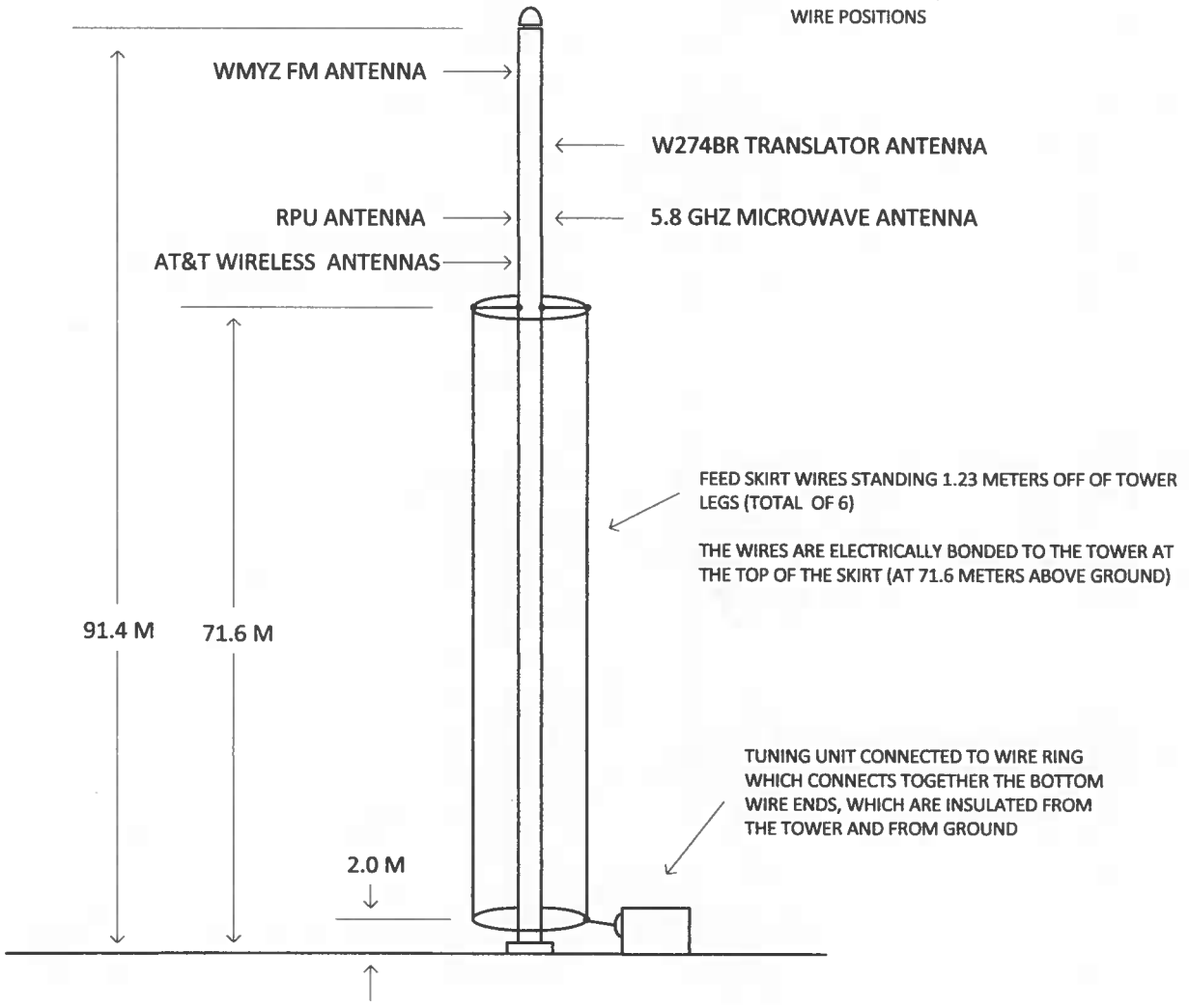
Item 3

NOT TO SCALE

ONLY RF PERFORMANCE-RELATED DETAILS SHOWN



TOP VIEW OF VERTICAL SKIRT WIRE POSITIONS



SKETCH SHOWING RELATIVE POSITIONS OF TOWER-MOUNTED ANTENNAS AND FEED SKIRT PARTICULARS

RADIO STATION WVLG
WILDWOOD, FLORIDA

640 KHZ 0.93 KW DAY 0.86 KW NIGHT

du Treil, Lundin & Rackley, Inc.